

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REMBRANDT 3D HOLDING LTD,

Plaintiff,

v.

TECHNOVATIVE MEDIA, INC, HAWK
INVESTMENT HOLDINGS LTD., and
SEECUBIC, INC.,

Defendants.

C.A. No. 1:23-cv-00193-JLH












JURY TRIAL DEMANDED








REMBRANDT 3D HOLDING LTD.'S DISCLOSURE OF TRADE SECRETS

PURSUANT TO THE COURT'S SCHEDULING ORDER (D.I. 55 & 61)

Pursuant to the Court's Scheduling Order (D.I. 55) and the subsequent order of the Court extending time for the above deadline (D.I. 61), Plaintiff Rembrandt 3D Holding Ltd ("Plaintiff"), makes the following limited disclosure of information pertaining to its trade secrets for the purposes of this litigation

Number	Trade Secret Description	How Protected
1	Utilizing the Philips 2D switchable lens technology for refractive and defractive lens switching for the create of the lightfield and 3D content artifact correction	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
2	Utilizing the Philips 2D switchable lens technology for border-blending in 3D content	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
3	Utilizing the Philips 2D switchable lens technology for depth smoothing in 3D content	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
4	Utilizing the Philips 2D switchable lens technology for depth smoothing in 3D content	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations

5		NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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		invention assignment agreements, employee confidentiality obligations
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12	    	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
13	  	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations

14	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
15	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
16	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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18	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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43	<div>O [REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations

	<div>[REDACTED]</div> <div>[REDACTED]</div>	
44	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
45	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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47	<div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 30%;"></div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
48	<div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 10%;"></div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
49	<div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 5%;"></div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
50	<div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 100%;"></div> <div style="background-color: black; height: 1.2em; width: 25%;"></div> <div style="background-color: black; height: 1.2em; width: 60%;"></div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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58	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations

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67	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
68	<div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div> <div>[REDACTED]</div>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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143	<p>Slant + motion algorithm is the least effective and uses only uses a fixed slant (top of the image to the back, and the bottom to the front), and depth-from-motion, and then applies a regularisation postprocessing.</p>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
144	<p>The FW version is the algorithm that is implemented in the firmware (the 8" and the conversion box). It is also based on a slant with post-processing, but implements it differently and has a "liveliness" parameter which can be adjusted to tune the amount of deviation from the slant.</p>	NDA and other agreements with Philips, Stream, Rajans, and all employees of 3D Fusion EU B.V. (eventually with SeeCubic B.V.), invention assignment agreements, employee confidentiality obligations
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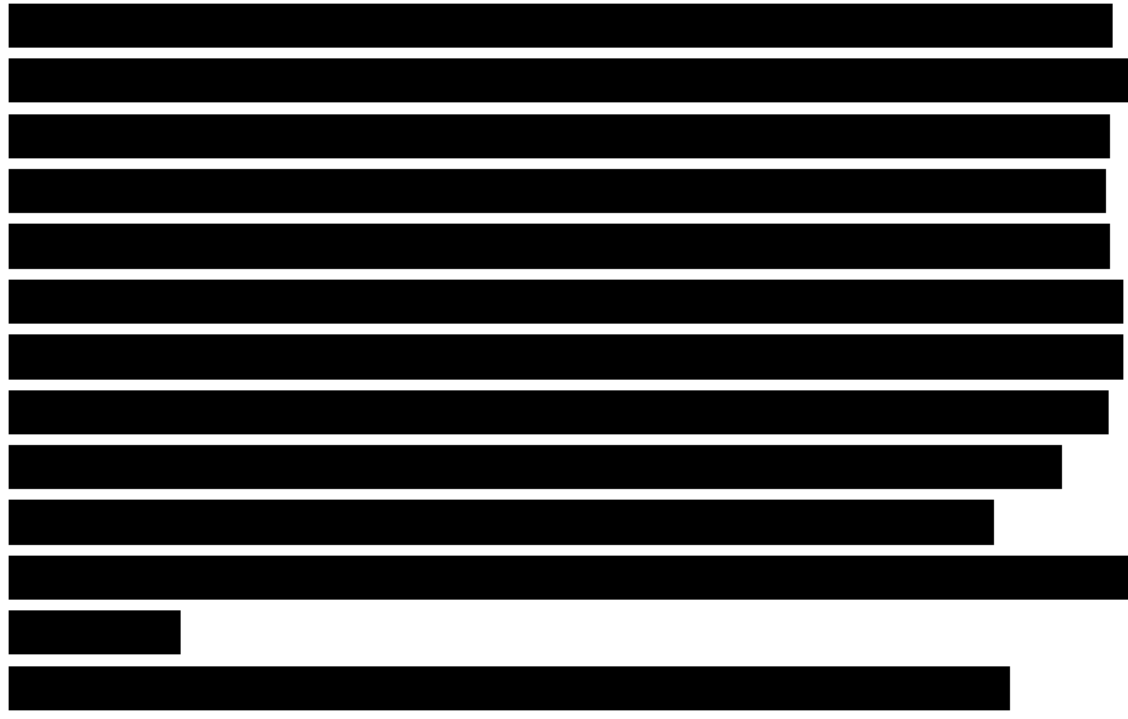
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Dated: October 11, 2024

Respectfully submitted,

/s/ Andrew DeMarco

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